

STATE OF INDIANA)
) SS: IN THE LAKE CIRCUIT/SUPERIOR COURT
COUNTY OF LAKE) SITTING AT _____, INDIANA

SHAMEKA REDFIELD,)
)
Plaintiff,)
)
v.) CAUSE NO. 45C01-2003-CT-000288
)
PHILLIP R. UTHE and)
TEAM INDUSTRIAL SERVICES, INC.,)
)
Defendants.)

COMPLAINT

Plaintiff, SHAMEKA REDFIELD (hereinafter "Shameka"), by counsel, KENNETH J. ALLEN LAW GROUP, LLC, for her Complaint against Defendants, TEAM INDUSTRIAL SERVICES, INC. (hereinafter "TEAM") and PHILLIP R. UTHE (hereinafter "UTHE"), alleges and states as follows:

1. At all times relevant, TEAM had offices and conducted business within Lake County, State of Indiana, for financial gain and profit.
2. At all times relevant, PHILLIP R. UTHE (hereinafter "UTHE") was employed by TEAM.
3. At all times relevant, Shameka was and is a resident of Lake County, State of Indiana.
4. At all times relevant, TEAM owned, leased, possessed and/or otherwise



controlled a Chevrolet 3500 pickup truck.

5. On or about September 13, 2018, TEAM furnished, made available and/or otherwise entrusted its Chevrolet 3500 pickup truck to UTHE.

6. On September 13, 2018, UTHE operated TEAM's Chevrolet pickup truck westbound on US 12 in the center lane at or near its intersection with Taft Street in Gary, Lake County, Indiana.

7. On September 13, 2018, Shameka was operating a Nissan Rogue westbound on US 12 in the left lane at or near its intersection with Taft Street in Gary, Lake County, Indiana.

8. At all times relevant herein, UTHE owed Shameka, and others on the roadway, a duty to behave reasonably in the care, use and operation of the vehicle he was operating to avoid injury and harm to her and others.

9. At all times relevant herein, TEAM owed Shameka, and others on the roadway, a duty to behave reasonably in hiring, training, supervising, and retaining employees and agents, and in acquiring, maintaining, inspecting, furnishing or otherwise entrusting vehicles for use by employees and agents, and otherwise in avoiding causing harm to Shameka, and others.

10. On and before September 13, 2018, UTHE and TEAM breached the foregoing duties and were negligent, grossly negligent, reckless, and/or willful and

wanton.

11. As a direct and proximate result of UTHE's and TEAM's aforesaid negligence, gross negligence, recklessness, and/or willfulness and wantonness, UTHE improperly turned into Shameka's lane of travel and violently crashed into her vehicle.

12. As a direct and proximate result of the foregoing crash and the conduct of TEAM, Shameka sustained permanent and severe personal injuries; incurred and will incur ambulance, hospital, diagnostic, surgical, therapeutic, pharmaceutical, and other medical expenses; suffered and will suffer physical pain, mental suffering, terror, fright, humiliation, loss of enjoyment of life, and permanent impairment; sustained and will sustain lost wages and a permanent impairment of her ability to earn wages in the future; disability; disfigurement; lost time; and incurred other injuries and damages of a personal and pecuniary nature.

13. At all relevant times herein, UTHE was acting within the course and scope of his employment with TEAM.

14. At all relevant times herein, UTHE was subject to TEAM's control, acting pursuant to its directions and commands, acting as its agent, acting in furtherance of its interests and utilizing TEAM's Chevrolet 3500 pickup truck for TEAM's pecuniary benefit. TEAM is therefore viciously liable for UTHE's negligence, gross negligence, recklessness and/or willful and wanton conduct.

WHEREFORE, Plaintiff, SHAMEKA REDFIELD, respectfully seeks the entry of judgment in her favor and against PHILLIP R. UTHE and TEAM INDUSTRIAL SERVICES, INC., for compensatory and punitive damages in an amount to be determined herein, for the costs of this action, prejudgment interest, and for any and all other relief that the Court may deem proper under the circumstances.

Respectfully submitted,

KENNETH J. ALLEN LAW GROUP, LLC
Attorneys for Plaintiff

/s/ Christopher Hansen

Kenneth J. Allen, 3857-45
Christopher R. Hansen, 30341-64

JURY DEMAND

Plaintiff demands trial by jury on all allegations of her Complaint.

Respectfully submitted,

KENNETH J. ALLEN LAW GROUP, LLC
Attorneys for Plaintiff

/s/ Christopher Hansen

Kenneth J. Allen, 3857-45
Christopher R. Hansen, 30341-64



INJURY ATTORNEYS

www.kenallenlaw.com

Refer to Office Indicated

☒ **ALLEN LAW BUILDING:**
1109 Glendale Boulevard
Valparaiso, IN 46383
219.465.6292

☐ **JOLIET OFFICE:**
1008 Essington Road
Joliet, IL 60435
815.725.6292

☐ **MERRILLVILLE OFFICE:**
3700 E. Lincoln Highway (U.S. 30)
Merrillville, IN 46410
219.736.6292

☐ **TINLEY PARK OFFICE:**
16335 S. Harlem Avenue
Tinley Park, IL 60477
708.460.6292

☐ **INDIANAPOLIS OFFICE:**
201 N. Illinois Street (South Tower)
Indianapolis, IN 46204
317.842.6926

☐ **CHICAGO OFFICE:**
150 N. Michigan Avenue
Chicago, IL 60606
312.236.6292

COUNTY OF LAKE

CAUSE NO.: _____

45C01-2003-CT-000288

SHAMEKA REDFIELD,

Plaintiff,

-v-

PHILLIP R. UTHE and
TEAM INDUSTRIAL SERVICES, INC.,

Defendants.

S U M M O N S

THE STATE OF INDIANA TO THE DEFENDANT:

PHILLIP R. UTHE1375 E. North StreetBradley, IL 60915

You have been sued by the person(s) identified as "Plaintiff" in the Court stated above.

The nature of the suit against you is stated in the COMPLAINT which is attached to this SUMMONS. It also states the demand which the Plaintiff has made against you.

You must either personally or by your attorney file your written answer to the COMPLAINT with the Clerk within twenty (20) days commencing the day after this SUMMONS and the COMPLAINT were personally served upon you or your agent or left for you by the Sheriff or other process server.

In the event the SUMMONS and COMPLAINT were left for you and you then receive by first class mail (not certified) a copy of the SUMMONS alone, this mailing is merely a confirmation that the SUMMONS and COMPLAINT were previously left for you. You should not consider the date on which you receive the mailed SUMMONS as the commencement date for the time period allowed for your answer. Rather, the time period allowed for your written answer commences on the date when the SUMMONS and COMPLAINT were first personally served upon you or your agent or left for you by the Sheriff of other process server.

However, if you or your agent first received the SUMMONS and the COMPLAINT by certified mail, you have twenty-three (23) days from the date of receipt to file your written answer with the Clerk.

If you fail to answer the COMPLAINT of the Plaintiff within the times prescribed herein, judgment will be entered against you for what the Plaintiff has demanded.

If you have a claim against the Plaintiff arising from the same transaction or occurrence, you may be required to assert such claim in writing together with your written answer.

The following manner of service is hereby designated: CERTIFIED MAIL

Attorney for Plaintiff:

Christopher R. Hansen, Esq.Ind. Atty. No. 30341-641109 Glendale BoulevardValparaiso, Indiana 46383Tel. No.: (219) 465-6292Date: 3/16/2020

LORENZO ARREDONDO

CLERK OF THE LAKE CIRCUIT AND SUPERIOR COURTS

By: _____

Deputy Clerk

KP



PREPARATION DATA:

All Summons are to be prepared in triplicate with the original of each to be placed in the Court file with two copies available for service.

If service is by certified mail a properly addressed envelope shall be provided for each Defendant.

Certified mail labels and return receipts must also be furnished for each mailing and the cause number must appear on each return receipt, which shall be returnable to the Clerk at the address of the Court (Form: CS 1/97)

CERTIFICATE OF MAILING

I hereby certify that on the _____ day of _____, I mailed a copy of this SUMMONS and a copy of the COMPLAINT to the Defendant, _____ by _____ mail, requesting a return receipt, at the address furnished by the Plaintiff.

LORENZO ARREDONDO
CLERK OF THE LAKE CIRCUIT AND SUPERIOR COURTS

Dated: _____, 20____. By: _____
Deputy Clerk

RETURN ON SERVICE OF SUMMONS BY MAIL

I hereby certify that the attached return receipt was received by me showing that the SUMMONS and a copy of the COMPLAINT mailed to Defendant _____ was accepted by the Defendant on the _____ day of _____, 20____.

LORENZO ARREDONDO
CLERK OF THE LAKE CIRCUIT AND SUPERIOR COURTS

Dated: _____, 20____. By: _____
Deputy Clerk

RETURN OF SERVICE OF SUMMONS BY SHERIFF

I hereby certify that I have served the within SUMMONS:

1. By delivering on _____, 20____, a copy of this SUMMONS, a copy of the COMPLAINT and all other materials filed the same date to each of the within named person(s).

2. By leaving on _____, 20____, for each of the within named person(s) _____ a copy of the SUMMONS, a copy of the COMPLAINT and all other materials filed the same date at the respective dwelling house or usual place of abode of in _____, Indiana, with a person of suitable age and discretion residing within, whose usual duties or activities include prompt communication of such information to the person served, or by otherwise leaving such process threat, and by mailing a copy of the SUMMONS without the COMPLAINT to the said named person(s) at the address listed herein.

3. This SUMMONS came to hand this date, _____, 20____. The within named _____ was not found in my bailiwick this date, _____, 20____.
ALL DONE IN LAKE COUNTY, INDIANA.

OSCAR MARTINEZ
SHERIFF OF LAKE COUNTY, INDIANA

By: _____

SERVICE ACKNOWLEDGED

A copy of the within SUMMONS, a copy of the COMPLAINT and all materials filed the same date attached thereto were received by me at _____ in _____, Indiana, on this date, _____, 20____.

Signature of Defendant

COUNTY OF LAKE

CAUSE NO.: _____

45C01-2003-CT-000288

SHAMEKA REDFIELD,

Plaintiff,

-v-

PHILLIP R. UTHE and
TEAM INDUSTRIAL SERVICES, INC.,

Defendants.

S U M M O N S

THE STATE OF INDIANA TO THE DEFENDANT:

TEAM INDUSTRIAL SERVICES, INC.c/o Corporation Service Company135 North Pennsylvania Street, Suite 1610Indianapolis, IN 46204

You have been sued by the person(s) identified as "Plaintiff" in the Court stated above.

The nature of the suit against you is stated in the COMPLAINT which is attached to this SUMMONS. It also states the demand which the Plaintiff has made against you.

You must either personally or by your attorney file your written answer to the COMPLAINT with the Clerk within twenty (20) days commencing the day after this SUMMONS and the COMPLAINT were personally served upon you or your agent or left for you by the Sheriff or other process server.

In the event the SUMMONS and COMPLAINT were left for you and you then receive by first class mail (not certified) a copy of the SUMMONS alone, this mailing is merely a confirmation that the SUMMONS and COMPLAINT were previously left for you. You should not consider the date on which you receive the mailed SUMMONS as the commencement date for the time period allowed for your answer. Rather, the time period allowed for your written answer commences on the date when the SUMMONS and COMPLAINT were first personally served upon you or your agent or left for you by the Sheriff of other process server.

However, if you or your agent first received the SUMMONS and the COMPLAINT by certified mail, you have twenty-three (23) days from the date of receipt to file your written answer with the Clerk.

If you fail to answer the COMPLAINT of the Plaintiff within the times prescribed herein, judgment will be entered against you for what the Plaintiff has demanded.

If you have a claim against the Plaintiff arising from the same transaction or occurrence, you may be required to assert such claim in writing together with your written answer.

The following manner of service is hereby designated: CERTIFIED MAIL

Attorney for Plaintiff:

Christopher R. Hansen, Esq.Ind. Atty. No. 30341-641109 Glendale BoulevardValparaiso, Indiana 46383Tel. No.: (219) 465-6292Date: 3/16/2020

LORENZO ARREDONDO

CLERK OF THE LAKE CIRCUIT AND SUPERIOR COURTS

By: _____

Deputy Clerk

PREPARATION DATA:

All Summons are to be prepared in triplicate with the original of each to be placed in the Court file with two copies available for service.

If service is by certified mail a properly addressed envelope shall be provided for each Defendant.

Certified mail labels and return receipts must also be furnished for each mailing and the cause number must appear on each return receipt, which shall be returnable to the Clerk at the address of the Court (Form: CS 1/97)



CERTIFICATE OF MAILING

I hereby certify that on the _____ day of _____, I mailed a copy of this SUMMONS and a copy of the COMPLAINT to the Defendant, _____ by _____ mail, requesting a return receipt, at the address furnished by the Plaintiff.

LORENZO ARREDONDO
CLERK OF THE LAKE CIRCUIT AND SUPERIOR COURTS

Dated: _____, 20____. By: _____
Deputy Clerk

RETURN ON SERVICE OF SUMMONS BY MAIL

I hereby certify that the attached return receipt was received by me showing that the SUMMONS and a copy of the COMPLAINT mailed to Defendant _____ was accepted by the Defendant on the _____ day of _____, 20____.

LORENZO ARREDONDO
CLERK OF THE LAKE CIRCUIT AND SUPERIOR COURTS

Dated: _____, 20____. By: _____
Deputy Clerk

RETURN OF SERVICE OF SUMMONS BY SHERIFF

I hereby certify that I have served the within SUMMONS:

1. By delivering on _____, 20____, a copy of this SUMMONS, a copy of the COMPLAINT and all other materials filed the same date to each of the within named person(s).

2. By leaving on _____, 20____, for each of the within named person(s) _____ a copy of the SUMMONS, a copy of the COMPLAINT and all other materials filed the same date at the respective dwelling house or usual place of abode of in _____, Indiana, with a person of suitable age and discretion residing within, whose usual duties or activities include prompt communication of such information to the person served, or by otherwise leaving such process threat, and by mailing a copy of the SUMMONS without the COMPLAINT to the said named person(s) at the address listed herein.

3. This SUMMONS came to hand this date, _____, 20____. The within named _____ was not found in my bailiwick this date, _____, 20____.
ALL DONE IN LAKE COUNTY, INDIANA.

OSCAR MARTINEZ
SHERIFF OF LAKE COUNTY, INDIANA

By: _____

SERVICE ACKNOWLEDGED

A copy of the within SUMMONS, a copy of the COMPLAINT and all materials filed the same date attached thereto were received by me at _____ in _____, Indiana, on this date, _____, 20____.

Signature of Defendant